

AUSA: Ashley C. Nicolas

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SHAMAR JEFFERSON,

Defendant.

23 MAG 7133

COMPLAINT

Violations of 18 U.S.C. §§ 922(g) and 2.

COUNTY OF OFFENSE:
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

MICAH FRIEDMAN, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), and charges as follows:

COUNT ONE
(Possession of Ammunition After a Felony Conviction)

1. On or about October 15, 2023, in the Southern District of New York and elsewhere, SHAMAR JEFERSON, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit, two .32 caliber cartridges, and the ammunition was in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. Based on my review of reports prepared by officers from the New York City Police Department (“NYPD”) as well as my review of surveillance video, I have learned, among other things and as more particularly described below, that on or about October 15, 2023, a shootout (the “Shootout”) between at least two individuals occurred in the vicinity of 1080 Anderson Avenue in the Bronx, New York, during which multiple rounds were discharged and at least one person was injured.

3. Based on my review of surveillance video and audio captured from residences and store fronts on Anderson Avenue, I have learned, among other things, the following:

- a. On or about October 15, 2023, at approximately 10:26 p.m., a man in black pants, a dark hooded sweatshirt, and black and white shoes (“Shooter-1”) was standing in conversation with an unidentified woman across the street from 1080 Anderson Avenue. During the conversation, Shooter-1 stated, “they’re fucking with my money.” Woman-1 responded, in sum and substance, that there was enough money for everyone, to which Shooter-1 responded, “fuck that, I’m out here, I’m going to stay out here.”
- b. Moments later, Shooter-1 began walking northbound on Anderson Avenue toward 1120 Anderson Avenue. At approximately 10:28 p.m., Shooter-1 began crossing Anderson Avenue, moving in an easterly direction. Simultaneously, four men (the “Group”) exited the lobby of 1080 Anderson Avenue.
- c. As Shooter-1 crossed Anderson Avenue, the Group began firing gunshots in the direction of Shooter-1. Shooter-1 raised his arm as if he was retuning gunfire, and ran behind a car near 1110 Anderson Avenue, where he continued to return fire.
- d. After the Shootout, at approximately 10:29 p.m., Shooter-1 ran northbound, further down the block with a slight limp before entering 1122 Anderson Avenue.
- e. At the same time, the Group reentered the lobby of 1080 Anderson Avenue. As depicted below, one of the men, later identified as SHAMAR JEFFERSON, the defendant, can be seen holding a firearm in his right hand (circled in white below). As JEFFERSON stood in the entrance of the lobby, he pulled back the slide of the gun, and looked in the chamber, which, based on my training and experience, I recognized as the method by which one checks if a gun is loaded or attempts to

clear a malfunction. Further, based on my training and experience, I know that when the slide is pulled back on a loaded gun, a round is ejected. If there is a malfunction, multiple rounds may be ejected.



4. Based on my involvement in the investigation and my review of reports including property vouchers prepared by officers from the NYPD, I have learned the following:

- a. On or about October 15, 2023, at approximately 10:28 p.m., officers from the NYPD received a shotspotter activation, notifying them of suspected gunshots in the vicinity of Anderson Avenue in the Bronx, New York.
- b. NYPD Officers who responded to the shotspotter activation (the “Responding Officers”) recovered a total of 18 shell casings and live rounds from the scene along Anderson Avenue. In particular and among other things, the Responding Officers recovered two live .32 caliber rounds (the “Live Ammunition”) in front of the door of 1080 Anderson Avenue — consistent with the surveillance video described above during which SHAMAR JEFFERSON, the defendant, can be seen pulling back the slide of the firearm he was holding after the Shootout. In addition to the

Live Ammunition, approximately 20 meters from the door of 1080 Anderson Avenue, the Responding Officers recovered three spent shell casings.

- c. At approximately 10:34 p.m. — approximately six minutes after the shotspotter activation — the Responding Officers encountered a man matching the appearance of Shooter-1, with a gunshot wound to the leg, near 1122 Anderson Avenue.
5. Based on my review of the surveillance video of Shooter-2 described above and my review of photographs of JEFFERSON contained in an NYPD database, I have identified Shooter-2 as SHAMAR JEFFERSON, the defendant.

6. On or about November 8, 2023, the Honorable Sarah Netburn, United States Magistrate Judge, Southern District of New York, authorized the search of an apartment in which SHAMAR JEFFERSON, the defendant, resides. Based on my participation in the search and as depicted below, during the search, law enforcement officers recovered a t-shirt matching the t-shirt worn by Shooter-2 during the Shootout.



7. Based on my conversations with a Special Agent from the United States Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) who is familiar with the manufacturing of ammunition and who reviewed photographs of the Live Ammunition, I know that the Live Ammunition was manufactured outside the State of New York.

8. I have reviewed criminal history records pertaining to SHAMAR JEFFERSON, the defendant, which show that JEFFERSON was convicted on or about March 19, 2019, in Bronx County Supreme Court of criminal possession of a controlled substance in the third degree and was sentenced to a two-year term of imprisonment.

WHEREFORE, I respectfully request that SHAMAR JEFFERSON, the defendant, be imprisoned or bailed, as the case may be.



MICAH FRIEDMAN
Special Agent, FBI

Sworn to before me this
8th November day of 2023.



THE HONORABLE SARAH NETBURN
United States Magistrate Judge
Southern District of New York